



700 5th Ave, Suite 3200 | P.O. Box 34023 | Seattle WA 98124-4023
TEL (206) 684-3000 TTY/TDD (206) 684-3225 FAX (206) 625-3709
seattle.gov/light

twitter.com/SEACityLight facebook.com/SeattleCityLight

PATRICK LIZON
WATER QUALITY PROGRAM
WASHINGTON STATE DEPARTMENT OF ECOLOGY
P.O. BOX 47600
OLYMPIA, WA 98504-7600

May 15, 2015

Re: Comment Letter on Proposed Water Quality Assessment and 303(d) List for Washington State

Dear Mr. Lizon;

Seattle City Light is pleased to provide comments on the updated Washington State Water Quality Assessment, based on fresh water data. Seattle City Light is a partner with the Washington State Department of Ecology and other stakeholders in maintaining water quality standards for public use and the protection of native fish and wildlife.

Our comments apply to those listings in Water Resource Inventory Area 62 in the Pend Oreille River Basin. Seattle City Light maintains and operates the Boundary Hydroelectric Project on the mainstem Pend Oreille River and is currently implementing a wide variety of habitat enhancement measures in the tributaries to the Boundary reservoir to restore the health and abundance of native salmonid species. Some of the measures we are implementing are expected to reduce water temperature. They include construction of a cold water pipe out of Sullivan Lake and removal of Mill Pond Dam on Sullivan Creek in partnership with Pend Oreille PUD. Extensive riparian plantings in tributaries to Boundary reservoir are also expected to improve tributary temperatures.

In conjunction with our efforts in the basin, Seattle City Light maintains thermistors in numerous locations to monitor water temperature, an important water quality parameter for native salmonids. SCL began collecting temperature data in 2011 and we continue to monitor numerous streams and stream segments in WRIA 62. We have reviewed listings in the Sullivan Creek Watershed (listings 19858 and 73117) and the Slate Creek Watershed (listing 19848). We understand that the assessment is using only data collected through December 31, 2010, and believe that data is not reflective of current conditions. We have comments on these listings and plan to submit our data for the next review process so that it will more accurately assess temperature conditions in these streams.

Slate Creek Listing 19848 – Proposed Category 2

The exceedances noted for listing 19848 are infrequent, old, and indicate only one 7DADmax of 14.5°C. Our thermistor data in one of the study reaches that was installed in 2011 does not indicate any exceedances, and temperatures have never exceeded 12°C. Slate Creek is one of coldest tributaries, and we question the accuracy and relevance of the data identified in the listing.

Sullivan Creek Listing 73117 – Proposed Category 4A

Our thermistor data indicates that temperatures have, for very short periods of time, exceeded the 7-day mean of daily maximum values of 12°C, but not to the extent that the older data indicate. As stated above, we expect this to continue to improve as restoration projects are implemented.

Sullivan Creek Listing 19858 – Proposed Category 4A

We currently have two thermistors in this listing area, one at the upstream end near the South Fork of Sullivan Creek and one at the downstream end near the town of Metaline Falls. We will have accurate data for this listing area in the next review process.

In conclusion, we again thank the Washington State Department of Ecology for inviting public input on the 303(d) listing process and look forward to the inclusion of Seattle City Light's data, which we believe to be more accurate and current, in the next listing process. If you have any questions about our comments, please feel free to call me at (206) 684-3798.

Sincerely

A handwritten signature in black ink, appearing to read 'John Armstrong', written over a horizontal line.

John Armstrong
Boundary License Implementation Manager

CC: Karin Baldwin, DOE
Pat McGuire, DOE
Teresa Wagner, Seattle Law Dept.
Lynn Best, SCL
Christine Pratt, SCL